HEXION™
Specialty Chemicals

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March 8, 2007

CERTIFIED MAIL
Bijan Sharafkhani, P.E., Administrator
Environmental Services - Environmental Technology
Louisiana Department of Environmental Quality
P. O. Box 4313
Baton Rouge, LA 70821-4313

RECEIVED
MAR 19 2007
WATER & WASTE PERMITS DIVISION
SOLID & HAZARDOUS WASTE SECTION

Subject: Amendment to Submittal of Dioxin & Furan Test Plan for Alternative Monitoring Application for Maximum Catalyst Time In-Use for 40 CFR Subpart EEE
RCRA Permit: LAD 980621104
Hexion Specialty Chemicals, Inc. – Norco, LA
Agency Interest No. 87883

Hexion Specialty Chemicals (Hexion) is submitting an amendment to its Dioxin & Furan Test Plan sent to LDEQ on February 23, 2007 for the facility's organic chloride incinerator systems (NCIN-1 and NCIN-2). The plan is to provide data to LDEQ in efforts to approve the Maximum Catalyst Time In-Use proposed in the Alternative Monitoring Application for 40 CFR Subpart EEE. Hexion plans to commence dioxin/furan testing as early as March 26, 2007.

The target operating conditions for the test are shown in Table A. In addition, the following updates have been made to the plan:

- The set points for each parameter during the test are shown in Table B.
- As requested by LDEQ, the Quality Assurance Officer (QAO) will read and agree to the *Scope of Duties* developed and posted on LDEQ's website at:

  http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2378#qao.

- The QAOs signature on the QAPP signature page will signify his/her knowledge of and agreement to meet each of these responsibilities.

If there are any question or you need additional information, please contact Andrea Perez at (504) 472-6563.

Sincerely,

Andrea J. Perez
Environmental, Health & Safety Manager

2007 MAR 13 PM 2:00
DEQ - OES

Table A: Proposed NCIN-1 and NCIN-2 Target Operating Conditions During Testing

Operational Parameter	NCIN-1	NCIN-2	AWFCO	Averaging Period
Group 1 Parameters				
Maximum liquid waste feed rate (lb/hr)	8343	7229	Yes	Hourly Rolling Average
Minimum combustion temperature (° F)	1718	1718	Yes	Hourly Rolling Average
Minimum caustic scrubber recycle flow (gpm) (minimum L/G)	550	403 per scrubber	Yes	Hourly Rolling Average
Minimum caustic scrubber pH	9.2	8.2	Yes	Hourly Rolling Average
Maximum caustic scrubber recycle conductivity (µS/cm)	20664	19908	Yes	12-Hour Rolling Average
Maximum stack gas flow (mscfm)	17.19	14.56	Yes	Hourly Rolling Average
Group 2 Parameters				
Maximum combustion chamber pressure (inwc)	0.0	0.0	Yes	None; 1-second delay
Maximum stack gas CO conc. (ppmv, dry @ 7% O2)	100	100	Yes	Hourly Rolling Average
Group 3 Parameters				
Mimimum caustic scrubber recycle pressure (psig)	13	54	No	Hourly Rolling Average
Minimum CATOX inlet gas temperature (° F)	330	330	Yes	Hourly Rolling Average
Maximum CATOX inlet gas temperature (° F)	700	700	Yes	Hourly Rolling Average

Notes: AWFCO - automatic waste feed cutoff

Table B: Proposed NCIN-1 and NCIN-2 Target Set Point Conditions During Testing

Operational Parameter	NCIN-1	NCIN-2	AWFCO	Averaging Period
Group 1 Parameters				
Maximum liquid waste feed rate (lb/hr)	8760	7590	Yes	Hourly Rolling Average
Minimum combustion temperature (° F)	1550	1550	Yes	Hourly Rolling Average
Minimum caustic scrubber recycle flow (gpm) (minimum L/G)	500	350 per scrubber	Yes	Hourly Rolling Average
Minimum caustic scrubber pH	8.0	7.0	Yes	Hourly Rolling Average
Maximum caustic scrubber recycle conductivity (µS/cm)	23764	22894	Yes	12-Hour Rolling Average
Maximum stack gas flow (mscfm)	20	18	Yes	Hourly Rolling Average
Group 2 Parameters				
Maximum combustion chamber pressure (inwc)	0.0	0.0	Yes	None; 1-second delay
Maximum stack gas CO conc. (ppmv, dry @ 7% O2)	100	100	Yes	Hourly Rolling Average
Group 3 Parameters				
Mimimum caustic scrubber recycle pressure (psig)	10	45	No	Hourly Rolling Average
Minimum CATOX inlet gas temperature (° F)	300	300	Yes	Hourly Rolling Average
Maximum CATOX inlet gas temperature (° F)	700	700	Yes	Hourly Rolling Average

Notes: AWFCO - automatic waste feed cutoff